

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CRIMINAL NO. 06-50 (GMS)
	:	
	:	
ASHLEY HARRISON	:	

**DEFENDANT ASHLEY HARRISON'S MOTION FOR ENLARGEMENT OF TIME**

Defendant, Ashley Harrison, by and through her counsel, Johanna E. Markind, Esquire, hereby moves this Honorable Court for an enlargement of time to file a motion *in limine* and to respond to the government's motion for the reasons set forth below:

1. At the pre-trial conference in this matter on April 23, 2007, the Court directed defendant to brief the admissibility of taped telephone conversations involving defendant or defendants in this matter by April 27, 2007.

2. Trial in this matter was continued from May 14, 2007, until June 18, 2007.

3. Because of the press of other cases, counsel for defendant will be unable to submit her brief by the close of business on April 27, 2007. Defendant Harrison respectfully requests that she be allowed to file her brief on or before Wednesday, May 2, 2007.<sup>1</sup> Defendant of course has no objection to granting other counsel additional time to respond to her motion.

4. Undersigned counsel has conferred with government counsel and they do not oppose the request.


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<sup>1</sup> Government counsel has obtained an extension of time from April 26 to May 1. Defendant believes she can complete briefing the matter by May 1 also but, as counsel is based on Philadelphia and does not have electronic filing privileges, Harrison requests the additional day to deliver the papers to the Court.

5. The government has requested and been granted an enlargement of time to file its own brief from April 26 to May 1. Harrison therefore requests additional time from May 3 to May 8 to respond to the government's brief. As noted in the government's brief, the government has no objection.

WHEREFORE, the defendant Ashley Harrison respectfully requests that this motion be granted.

Respectfully submitted,

  
Johanna E. Markind, Esquire

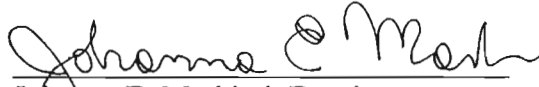
**CERTIFICATE OF SERVICE**

I hereby certify that on this date I served a copy of the foregoing motion upon the following persons by United States first class mail, postage pre-paid, to:

Douglas E. McCann, Esquire (AUSA)  
U. S. Attorney's Office  
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Date: April 26, 2007

  
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(215) 546-2212



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**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2007, upon consideration of defendant Ashley Harrison's motion for enlargement of time to file a motion *in limine* and to respond to the government's motion, it is hereby ORDERED that the motion is GRANTED. The briefing schedule set at the April 23, 2007, pre-trial conference in this matter is amended, as follows:

- a. Harrison has until May 2, 2007, to file her motion *in limine*;
- b. Defendants have until May 8, 2007, to file a response to the government's motion *in limine*.

BY THE COURT:

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Honorable Gregory M. Sleet, U.S.D.J.